


Exhibit B-15

CAUSE NO. 20-9524-442

FILED
DENTON COUNTY, TEXAS
2020 DEC 14 AM 11:09
DAVID TRANHAM
DISTRICT CLERK
BY  DEPUTY

YOUNG CONSERVATIVES OF
TEXAS FOUNDATION
Plaintiff,

v.

THE UNIVERSITY OF NORTH
TEXAS, THE UNIVERSITY OF
NORTH TEXAS SYSTEM, NEAL
SMATRESK, PRESIDENT OF THE
UNIVERSITY OF NORTH TEXAS,
and SHANNON GOODMAN, VICE
PRESIDENT FOR ENROLLMENT OF
THE UNIVERSITY OF NORTH
TEXAS
Defendants.

IN THE DISTRICT COURT OF

DENTON COUNTY, TEXAS

442ND JUDICIAL DISTRICT

**DEFENDANTS ANSWER AND AFFIRMATIVE DEFENSES
TO PLAINTIFF'S ORIGINAL PETITION AND REQUEST FOR DISCLOSURE**

TO THE HONORABLE JUDGE OF SAID COURT:

Defendants, University of North Texas, University of North Texas System, Neal Smatresk and Shannon Goodman (hereinafter collectively "Defendants") file this Answer and Affirmative and Other Defenses to Plaintiff, Young Conservatives of Texas Foundation Original Petition and Request for Disclosure. Defendants would respectfully show the Court the following:

I. GENERAL DENIAL

Pursuant to Texas Rule of Civil Procedure 92, Defendants deny each and every allegation and claim in Plaintiff's Petition (the "Petition") and demand strict proof thereof, as required by law.

II. AFFIRMATIVE DEFENSES

1. The Court lacks jurisdiction over one or more of Plaintiff's claims.
2. Defendants assert the defense of governmental and/or sovereign immunity as to any of Plaintiff's claims for which there has been no statutory or express waiver.
3. Defendants affirmatively assert the applicable statute of limitations to any of Plaintiff's claims made outside the limitations period, if any.
4. Plaintiff failed to exhaust administrative remedies or meet all conditions precedent and statutory prerequisites prior to filing this lawsuit, if applicable.
5. Defendants actions with regard to Plaintiff would have been the same even in the absence of facts Plaintiff claims resulted from alleged unlawful conduct.
6. Plaintiff has failed to mitigate damages, if any.
7. Defendants affirmatively assert that Plaintiff is estopped from seeking the relief claimed.
8. Defendants affirmatively assert that Plaintiff has waived one or more claims.

9. Defendants reserve the right to assert additional affirmative defenses as they become apparent.

III. PRAYER

Defendants prays that Plaintiff take nothing by this suit, that all costs be taxed and adjudged against Plaintiff, and that Defendants be granted such other and further relief to which they may be justly entitled.

Dated: December 14, 2020

Respectfully submitted,



RENALDO L. STOWERS
Texas Bar No. 19351450
Senior Associate General Counsel
renaldo.stowers@untsystem.edu
University of North Texas System
801 North Texas Boulevard
Denton, Texas 76201
(940) 565-2717
(940) 369-7026 FAX



Idolina "Dolly" Garcia
Texas Bar No. 00793773
Associate General Counsel
Dolly.Garcia@untsystem.edu
University of North Texas System
1901 Main Street
Dallas, Texas 75201
(214) 752-5970
(214) 752-5980 FAX

Attorneys for Defendants

CERTIFICATE OF SERVICE

On December 14, 2020, the undersigned attorney filed the foregoing document with the Clerk of the Court for Denton County via the Court's filing system, thus providing service of same upon all participants.



RENALDO L. STOWERS
Senior Associate General Counsel